

Michael Lamb
790214
3001 S. Emily Dr
Beeville, TX 78102

United States District Court
Central District of Texas
Beeville

AUG 22 2011

July 7, 2011

David J. Bradley, Clerk of Court

211-CV-00027

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34, Fed.R.Civ.P., the plaintiff requests that the defendants produce the documents requested within 30 days by providing the plaintiff with copies of such.

1. All documents pertaining to the outgoing chain for the following dates: May 24 thru May 28 and June 2 thru 7, 2010.
2. Medical records for plaintiff dated June 7, 2010.
3. Any and all documents pertaining to move/housing assignment for plaintiff for June 6 thru 8, 2010.
4. All grievances with any and all corresponding documents, investigative reports, etc... from the year 2005 to current.
5. All disciplinary cases with any and all corresponding documents written against plaintiff for the year 2010.
6. A record of all officers assigned to work 19 building on June 6th and 7th of 2010.
7. A record to verify Captain Jacquelyn Jameson was the night shift captain on May 24 and June 6, 2010.
8. A record to verify that the following were working on the unit June 7, 2010: Richard Crites, Adam Gonzales, Chester Todd, Cirildo Puente, Nikkie Tavaréz, Sgt. Gomez (female).
9. Any and all records concerning the disabling of plaintiff's commissary card or the freezing of his trust fund account in July or August of 2010.
10. All commissary receipts for plaintiff of the entire year of 2010.
11. Record to verify that the following were working on June 7, 2011: Cirildo Puente, Joshua Boyer, and William Mayfield.
12. List of all houses "shookdown" by Sgt. Joshua, Officer Mayfield, and unnamed C.O on the evening of June 7, 2011.
13. Shakedown list for 18-S-dorm for June 6 thru 8, 2011.
14. Any and all grievances, complaints, or other documents received by prison staff at McConnell Unit concerning mistreatment or retaliation of inmates by the named defendants in this suit since January 1, 2008 to present.

Michael Lamb